

[illegible]

1. On March 22, 2024, the plaintiff commenced this action by filing a complaint. [DE 1]
2. On April 3, 2024, the plaintiff caused summons to be issued to Defendant. [DE 6]

3. Upon information and belief, District Attorney Dixon was served on April 4, 2024.

4. The time for Defendant to answer or otherwise respond to the plaintiff's complaint has not expired.

5. Undersigned counsel has had intervening deadlines in other District Court cases, which have prevented her from being able to fully investigate and analyze the claims in the time initially allowed to respond.

6. It is respectfully submitted that a thirty-day extension will allow sufficient time for undersigned counsel to meet her obligations in other matters and fully investigate and analyze the issues raised and claims asserted in this action in order to formulate an appropriate response to Plaintiff's Complaint on behalf of the Defendants.

7. Plaintiff consents to this extension of time.

8. This motion is filed in good faith and for the reasons stated herein, and not for the purpose of delay.

WHEREFORE, DA Dixon respectfully moves for an order extending the time to answer or otherwise respond to the plaintiff's complaint for thirty (30) days, up to and including May 29, 2024. Pursuant to Civil Rule 5.3 (f) of the Local Rules of Practice and Procedure of the United States District Court for the Eastern District of North Carolina, a proposed order granting the relief requested is attached and emailed to the appropriate Judge's e-mail address.

Respectfully submitted, this the 23rd day of April, 2024.

JOSHUA H. STEIN
Attorney General

/s/ Chris D. Agosto Carreiro
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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day electronically filed the **MOTION FOR EXTENSION OF TIME** using the CM/ECF system, which will send notification of such filing to all the counsel of record for the parties who participate in the CM/ECF system and addressed to the following individuals:

*Cynthia B. Avens
303 Riverside Trl.
Roanoke Rapids, NC 27870*

This the 23rd day of April, 2024.

/s/ Chris D. Agosto Carreiro
Chris D. Agosto Carreiro
Special Deputy Attorney General
N.C. Department of Justice